

This is a Amendment to comments filled in the past action on  
RM-10740 - Updated Today - July 9th, 2003 - Terminal 11 - 2nd Floor  
Communications:

Upon review and reading of all 88 comments filed it is clear that  
a number of hams want the current rules enforced on bandwidth!

However the current rules make use of the outdated terms "No wider  
than the bandwidth of a Phone" emission for NBFM, and that bandwidth  
is not clearly defined in the rules. Using the current standard of  
a 6A3 emission or a 8A3 emission standard that was clearly defined  
in the past FCC rules for Business / Industrial / Police / Fire /  
and lots of other Commercial radio services in the past leaves to  
confusion when it comes to "Amateur" Radio!

The first thing that needs to be addressed is what is a standard AM  
emission, and what is a standard SSB emission.

Clearly hams want their station to have the best sound on the "Block"  
just as the kids who travel the village streets in their autos with  
the 300 watt car radio and CD's!

Hams will make part changes, and do things to manufactured radios  
like removing the "Hi Cut" audio filters that are built into most  
ham gear of today to make their station the big booming sound station  
on the block!

Turf wars on various frequencies looks to be the problem! Most hams  
don't want the regulations on bandwidth, but most make it clear the  
FCC should enforce the FCC's bandwidth rules.

The address the complaints to Mr. Hollingsworth, who has to work  
with an attorney's nightmare using the outmoded "Bandwidth" rule in  
part 97 text that any criminal law first year law student could  
beat the "Government" into the stone floor of the office's in  
Gettysburg, PA!

The clear cut issue is the "outmoded" wording of the text to give  
the "hams" the advantage to use future modes without having to  
re-write the rules everytime a new mode comes on the market, or is  
tested and commonly used on Part 97 subparts!

I look at the Text of KD5OEI, Mr. Jankowiak, [P-10-22028] Commercial  
License. High Quality AM and High Quality SSB requires more bandwidth  
and this is Text Book clear, but should this apply to Hams?

If you have an old Marine Radio or Military Radio that the OEM  
had a bandwidth of 8 kc AM or 6 kc SSB, then it should be grandfathered!

If you had a new Radio Shack HTX-10 and 2 kc deviation on FM well  
that's your OEM bandwidth of sorts!

I wish to point out that some Military Era Portables Radios from the  
collector standpoint use 15 kc frequency deviation starting at  
about 22 Mhz. This makes this radio totally illegal until the radio  
is modified and used in the area of 29.6 Mhz. However using the  
FCC's own words for FM "no wider than a PHONE emission" it's clear

we could be seeing NBFM of +6.0 kc deviation soon on some bands below 10 meters.

Clearly Mr. Hollingsworth & CREW can't enforce a un-clear rule or even more un-common "Good amateur Pratices" when the FCC's own law is full of "Loop-Holes" that allows anything go's!

Why pick on Mr. Hollingsworth where he's try-ed to do a good job as a enforcement agent of the commission. This request for Rule Making 10740 is the "Hot Issue" of poor rule & regulations text mater's and should be addressed to the primary sorce of the regulation construction Mr. William [Bill] Cross, of the WTB section of the FCC. Last I knew his e-mail was bcross@fcc.gov, however the general address I think is WTB@fcc.gov will also work!

I pointed out a long time ago a error in the fcc's text on some rules that were re-formated in regards to station KNAC-650 & KnAC-651 he had it fixed in 3 days! The commission lost pages of pages of text in there publication of new rules! Mr. Cross is a great radios history research person when it come to finding old original text of pre-fcc and past fcc stuff!

A few years ago perhaps in the 1980's the fcc made business go from 8A3 to 6A3 in AM, and on FM from 20F3 to 16F3. However the Federal Government, and Related Contractors along with the Police Radio Service wanted to use the New Digital Voice protection, or DES - DVP and lots of other formats to protect private safety communication. They once again need to have a emission standard of what was effective a +20F3 wider emission. This mistake to make everyone to use less, then a new format emission is developed for privacy to public safety radio made them go back to wider FM!

This was poor government planning, poor input from the equipment manufactures of public safety radios, and no real input from the general radio users. Now Ham's are allowed to use one of the wider digital standard called APCO mode 25 digital voice on VHF and UHF.

It's a Band Plan to allow the called Hi-Fi SSB that should be adressed by the ARRL and QRZ in a formated inquire, Where do we put the emission! How muth total band set aside for wide band audio! Both QRZ and QST should be addressing the need's of the ham communications public! Poll's & Text both!

Thanks

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I'm still for it but Modify it so it works!